

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
)
Plaintiff,)
) No. 20 CR 309
LARRY JONES,)
) Judge Virginia M. Kendall
Defendant.)
)

MOTION TO MODIFY THE CONDITIONS OF DEFENDANT
JONES' BOND TO PLACE HIM ON A CURFEW AS DIRECTED BY
PRETRIAL SERVICES

Defendant Larry Jones, by his attorney, Phillip A. Turner, respectfully requests that this court enter an order modifying the conditions of defendant Jones' bond to place him on a curfew as directed by Pretrial Services. In support of this motion, defendant states the following:

1. After the hearing on defendant's motion to change his third party custodian and his location, counsel conferred with Pretrial Services Officer, Samuel Schroeder, regarding any recommendations by Pretrial Services regarding the conditions of defendant's bond.
2. Pretrial Services recommends that the conditions of defendant's bond be modified to place him on a curfew with his hours established by Pretrial Services.

Wherefore, defendant respectfully requests that this Court enter an order modifying the conditions of defendant's bond to place him on a curfew with his hours to be established by Pretrial Services.

Respectfully submitted,
Phillip A. Turner
/s/Phillip A. Turner
Attorney for defendant
20 North Clark Street
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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that in accordance with Fed.R.Civ.P.5, LR 5.5 and the General Order on Electronic Case Filing (ECF), the following document:

MOTION TO MODIFY THE CONDITIONS OF DEFENDANT JONES' BOND TO PLACE HIM ON A CURFEW AS DIRECTED BY PRETRIAL SERVICES

was served pursuant to the district court's ECF system as to ECF filers.

Respectfully submitted,

Phillip A. Turner
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